

ERM-Southwest, inc.

16000 Memorial Drive • Suite 200 • Houston, Texas 77079-4006 • (713) 496-9600

June 15, 1989

Mr. Doice Hughes
Manager, Superfund Branch
Hazardous Waste Division
Arkansas Department of Pollution Control and Ecology
8001 National Drive
P.O. Box 9583
Little Rock, Arkansas 72209

W.O. #92-08

Subject: Disposal of Treated Water at the Arkwood, Inc. Site

Dear Mr. Hughes:

In a March 7, 1989 letter (attached) to Mr. Brent Truskowski of EPA, Region VI, we requested permission to dispose of approximately 4,000 gallons of decontamination water following treatment through a "Carbtrol" carbon adsorption system. EPA forwarded a copy of this request to your office for review. In your response dated March 22, 1989 you sent a memo from Roland McDaniel specifying a list of criteria that must be met before discharge can occur. We believe that the required discharge standards are more rigorous than is necessary and therefore request a waiver. We base this request on a number of factors which we wish to bring to your attention, including some changes as to how we propose to operate the water treatment and disposal.

We believe that the discharge standards presented in Mr. McDaniel's memo, while appropriate for regulating discharge to perennial streams, are not appropriate for regulating discharge of treated water to land adjacent to intermittent streams during periods of time when no stream flow is occurring.

Water treated through the "Carbtrol" system will be spray irrigated on the site to water vegetative cover. The water will be treated to below the detection limit of 50 ug/l for pentachlorophenol (PCP), and sprayed during the summer months when the intermittent stream beside the site is not flowing and when the major receiving stream, Cricket Stream, is also dry. We believe that a minimal amount of water, if any, is likely to reach the intermittent stream, that there is no chance for treated water to affect any stream supporting aquatic fauna, and therefore no regulatory discharge standards for protection of aquatic fauna are justified.

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ERM-Southwest, inc.

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In addition, the proposed standards for chloride, sulfate and total dissolved solids could not be met by any of the naturally occurring and unaffected ground water in the area. For instance, the local municipal wells have an average sulfate concentration of approximately 42 mg/l and 244 mg/l total dissolved solids. This compares to values of 20 mg/l of sulfate and 180 mg/l for total dissolved solids in the proposed discharge standard.

We therefore request that following carbon treatment water be allowed to be discharged as spray irrigation on the site without numerical discharge standards or bioassays. Our data, as attached to the March 7, 1989 letter, shows that there is no danger from the major constituent of concern, PCP, and therefore, the use of the treated water for irrigation will be beneficial to the site.

Should you have any questions or require any clarification, please do not hesitate to call me.

Sincerely,

ERM-SOUTHWEST, INC.

Steven H. Calhoun For

Richard H. Fuller, P.G.
Principal

RHF/sms:L517

cc: Jean Mescher, McKesson Corporation
Bob Ritchie, McKesson Corporation
Bob Barker, Mass Merchandisers, Inc.
Brent Truskowski, U.S., EPA, Region VI
Allan Gates, Mitchell, Williams, Selig, Jackson & Tucker
Dan MacLemore, Roy F. Weston, Inc.
Steve Calhoun, ERM-Southwest, Inc.
Douglas Diehl, ERM-Southwest, Inc.

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16000 Memorial Drive • Suite 200 • Houston, Texas 77079-4006 • (713) 496-9600

March 7, 1989

Mr. Brent Truskowski
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue
Dallas, Texas 75202

W.O. #92-08

Subject: "Carbtrol" Carbon Adsorption System Proposed for
Treatment of Decontamination Wastewater at Arkwood,
Inc. Site, Omaha, Arkansas

008471.002

Dear Mr. Truskowski:

During the week of 1/16/89, a carbon adsorption system was assembled at the Arkwood site. The system was purchased from the Carbtrol Corporation and consists of two 55-gallon drums filled with activated carbon and the necessary fittings and tubing to circulate water through both drums. The installation and operating instructions for this system have been attached to this letter.

The system was set up for a test run on January 21, and operated for a period of eight hours. Decontamination water from the 4,000 gallon holding tank was pumped at the rate of one gpm through the two carbon canisters and back into the tank. A sample of the decontamination water was obtained prior to system start-up and at the effluent end of the first carbon canister, eight hours after start-up. The results of the indicator compound analyses for these samples are attached to this letter. DECON 1 is the pretreatment sample and DECON 2 is the treated sample. Analytical results indicate that the decontamination water contains 1.6 ppm of pentachlorophenol (PCP). The treated sample contained no detectable PCP thus demonstrating the effectiveness of the system.

It is herein proposed that all decontamination water stored on site in the 4,000 gallon tank and numerous 55-gallon drums be treated using the carbon adsorption system. The raw decontamination water will be circulated through the system at the rate of one gpm and will then be discharged to the drainage ditch paralleling the Union Pacific Railroad tracks. Although not utilized during the system test, a cartridge prefilter will be utilized during actual operation to remove particulate matter from the water prior to pumping it into the carbon canisters.

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ERM-Southwest, inc.

Mr. Brent Truskowski
U.S. Environmental Protection Agency
March 7, 1989
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008471.003

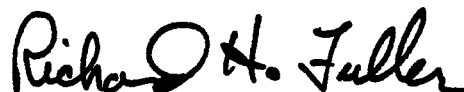
The two carbon canisters have sufficient capacity to treat all the decontamination water generated to date at the Arkwood site. However, to insure that this is the case, samples will be taken between the first and second canisters after each 48 hours of system operation and shipped for rush analysis for semi-volatile indicator compounds.

By sampling between the canisters, breakthrough will be detected at the effluent end of the first canister, thus leaving the second canister as a backup. If breakthrough of the first canister occurs, a replacement canister will be purchased and installed.

Upon receipt of Agency permission to operate the carbon adsorption system, stored decontamination water will be treated whenever an ERM-Southwest representative is on the site and has time to start and monitor the system. We would appreciate your prompt approval of this system as we would like to get it running the week of the 13th of March. If you have any questions concerning this matter, please give me a call.

Sincerely,

ERM-SOUTHWEST, INC.



Richard H. Fuller, P.G.
Principal

RHF/lmb:J140
Attachments

cc: Bob Barker, Mass Merchandisers, Inc.
Robert Ritchie, McKesson Corp.
Jean Mescher, McKesson Corp.
Dinah Darman, McKesson Corp.
Allan Gates, Mitchell, Williams, Selig, EtAl
Dan MacLemore, Roy F. Weston, Inc.
Douglas Diehl, ERM-Southwest, Inc.
Steve Calhoun, ERM-Southwest, Inc.



Mass Merchandisers, Inc.

Highway 43 and Cottonwood Road, Box 790, Harrison, Arkansas 72602-0790 Tel. (501) 741-3425

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SECTION VI

July 17, 1989

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SUPERFUND BRANCH

008472

Mr. Brent Truskowski
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202

Subject: Arkwood, Inc. Site (Omaha, AR)

Dear Mr. Truskowski:

Mass Merchandisers, Inc. ("MMI") has decided not to proceed with an interim removal action at the Arkwood, Inc. Site. In the course of work on the Feasibility Study, it has become apparent that remediation of the sinkhole and railroad ditch can be performed in a more cost-effective and efficient manner as an integral part of total site remediation, regardless of the remedial alternative selected.

You will recall that MMI proposed the interim removal as a cost-effective means of expediting site remediation. Since that key assumption no longer appears valid, remediation of the sinkhole and railroad ditch should occur as part of overall site remediation.

We apologize if this change of plans has inconvenienced EPA and trust that you will let me, Jean Mescher or Bob Ritchie know if you have any questions or comments.

Sincerely,

MASS MERCHANDISERS, INC.

C. R. Barker
Vice President, Support Services

CRB/ms

cc: Stu Braznell
Frank Conner
Dinah Darman, Esq.
Richard Fuller
Allan Gates, Esq.
Doice Hughes, ADPC&E
Dan N. MacLemore, III, Weston
Jean Mescher
Bob Ritchie

M-Kesson